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28 AURORA REGINO

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4 IN THE UNITED STATES DISTRICT COURT  
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7 EASTERN DISTRICT OF CALIFORNIA  
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10 AURORA REGINO,  
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13 Plaintiff,  
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16 vs.  
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19 SUPERINTENDENT KELLY STALEY, in her official  
20 capacity as Superintendent of the Chico  
21 Unified School District,  
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24 Defendant.  
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27 Case No.: 2:23-cv-00032-JAM-DMC  
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30 **STIPULATION AND ORDER TO EXTEND  
31 DEADLINE FOR DEFENDANT  
32 SUPERINTENDENT KELLY STALEY TO FILE  
33 RESPONSE TO SECOND AMENDED  
34 COMPLAINT TO JULY 9, 2025**

35 Second Amended Complaint Filed: 6/11/2025  
36 Complaint Filed: 1/6/2023  
37 Trial Date: Not Yet Set  
38  
39

40 Plaintiff AURORA REGINO (“Plaintiff”) and Defendant SUPERINTENDENT KELLY STALEY  
41 (“Superintendent Staley”) by and through their respective counsel of record, submit the  
42 following stipulation and proposed order seeking an extension of the deadline for  
43 Superintendent Staley to file her response to the Second Amended Complaint in the above-  
44 captioned matter (“SAC”), from the current deadline of June 25, 2025, to July 9, 2025 – an  
45 extension of 14 days.

46 WHEREAS, on July 11, 2023, this Court granted Superintendent Staley’s Rule 12 motion  
47 to dismiss the First Amended Complaint filed in the above-captioned matter in its entirety,  
48 without leave to amend (ECF 57); and

49 WHEREAS, on April 4, 2025, the United States Court of Appeals for the Ninth Circuit  
50 vacated that order, and remanded the matter back to this Court for further consideration (ECF  
51 69); and

1 WHEREAS, on June 4, 2025, Plaintiff filed a consent motion with this Court to file the  
2 operative SAC (ECF 82); and

3 WHEREAS, on June 11, 2025, this Court granted that consent motion, and ordered  
4 Superintendent Staley to respond to the amended pleading within fourteen days – i.e., June 25,  
5 2025 (ECF 85); and

6 WHEREAS, the SAC consists of both 31 pages of pleadings and approximately 905 pages  
7 of exhibits (ECF 84-84.10); and

8 WHEREAS, Superintendent Staley intends to file a new Rule 12 motion seeking dismissal  
9 of the operative SAC in its entirety; and

10 WHEREAS, in the interests of equity, Plaintiff agrees that Superintendent Staley should  
11 be afforded additional time to prepare her Rule 12 motion;

12 IT IS HEREBY STIPULATED by and between the parties that the Court should grant  
13 Superintendent Staley leave to file her response to the SAC by no later than July 9, 2025.

14  
15 Dated: June 13, 2025

**LEONE ALBERTS & DUUS**

16 /s/ Jimmie E. Johnson

17 LOUIS A. LEONE, ESQ.

18 *Of Counsel*

19 BRIAN A. DUUS, ESQ.

20 JIMMIE E. JOHNSON, ESQ.

21 Attorneys for Defendant

22  
23 Dated: June 13, 2025

**CENTER FOR AMERICAN LIBERTY  
DHILLON LAW GROUP INC.**

24 /s/ Joshua W. Dixon

25 JOSHUA W. DIXON, ESQ.

26 COURTNEY CORBELLO, ESQ.

27 JESSE FRANKLIN-MURDOCK

28 Attorneys for Plaintiff

1 **ORDER**

2 The Court, having received, read, and considered the stipulation of the parties, and  
3 good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order.  
4 The Court specifically finds that the failure to grant the stipulation in this case would deny  
5 Defendant SUPERINTENDENT KELLY STALEY (“Superintendent Staley”) a reasonable opportunity  
6 to address all of the factual allegations and causes of action raised in the operative Second  
7 Amended Complaint (“SAC”) in her forthcoming response.

8 Accordingly, the Court grants Superintendent Staley leave to file her response to the  
9 SAC by no later than July 9, 2025.

10 **IT IS SO ORDERED.**

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12 Dated: June 16, 2025

/s/ Daniel J. Calabretta

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THE HONORABLE DANIEL J. CALABRETTA  
14 UNITED STATES DISTRICT JUDGE